

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA**

TIFFANY LEWIS, on behalf of herself and  
others similarly situated,

Plaintiff,

v.

REGISTER.COM, INC.,

*Defendant.*

Case No. 1:25-cv-00275-JPH-MJD

CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

**DECLARATION OF BETHENA DASHER**


I, Bethena Dasher, hereby declare and state the following:

1. I have personal knowledge of the facts contained in this declaration, and if called as a witness, I could and would testify to their accuracy.
2. My name is Bethena Dasher and I am a Senior Manager of the Legal Department for Register.com, Inc. (“Register” or the “Company”), the named Defendant in the above-captioned civil action.
3. I am over eighteen (18) years of age and competent to testify.
4. Register is web technology company that offers online services, specifically domain hosting services, including domain name registration, domain name transfers, domain expiration protection, and domain privacy services.
5. Register is incorporated under the laws of the state of Delaware.
6. Register’s principal office is located in the state of Florida.
7. Register does not own any property and does not operate any office in the state of Indiana.

8. Register does not operate, oversee, or generally conduct its business from Indiana.
9. Although Register has certain customers who purport to reside in the state of Indiana, the Company does not specifically target customers in the state of Indiana.
10. Register does not derive a substantial portion of its business or revenue from customers in Indiana.

I swear under penalty of perjury that the foregoing is true and correct.

Dated: April 28, 2025

  
Bethena Dasher